

## EXHIBIT E

Affidavit of William Schwab, Esq.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Scott Romeo,  
Plaintiff  
  
v.

SIMM Associates, Inc.,  
Defendant

Docket 3:15-cv-02136-RPC  
  
(JUDGE RICHARD P. CONABOY)

**FILED ELECTRONICALLY**

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**DECLARATION OF WILLIAM G. SCHWAB**

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1. I am the sole principal of William G. Schwab and Associates.
2. I have been an attorney for 39 years and my practice is predominately litigation and bankruptcy. I also serve as a trustee in Chapter 7, Chapter 11, and Chapter 12 bankruptcy cases in this district. Through my experience as a trustee, I have become extremely familiar with the rates charged by attorneys for services performed the Northern Tier of the Middle District. I currently charge \$375.00 per hour. My hourly rate has been regularly approved by Bankruptcy Judge John J. Thomas and Bankruptcy Judge Robert N. Opel, II in numerous fee applications.
3. I have been advised that Carlo Sabatini is seeking reimbursement for services at the rate of \$375.00 per hour. His experience supports that rate.
4. Attorney Sabatini has been an attorney for sixteen years. He has lectured on bankruptcy and consumer credit topics, and is one of a very few practitioners

locally whom I consider to be an expert in issues of consumer law. His rate of \$375 per hour is a fair and reasonable rate in the Scranton-Wilkes-Barre market.

5. Additionally, Mr. Sabatini is board certified in consumer bankruptcy law by the American Board of Certification. This qualification warrants an upward modification to his hourly rate. See, 11 U.S.C. § 330(a)(3)(E).

6. I am familiar with Mr. Sabatini's work, having been the mediator assigned to a case that they pursued in this district under the Fair Debt Collections Protection Act. Marlene Moses v. The Law Office of Harrison Ross Byck, P.C., et al. 3:08-cv-01939 (M.D. Pa.). His work in that case was excellent. The matter eventually settled with the plaintiff receiving the maximum \$1,000.00 statutory damages, and Mr. Sabatini and his associate receiving over \$24,000.00 in fees. The settlement was approved by Judge Munley.

7. I am also told that Sabatini Law Firm, LLC is seeking compensation for the following individuals at the following rates:

- a. Kristin Sabatini, admitted in 2005: rate \$325.00 per hour.
- b. Brett Freeman, admitted in 2010: rate \$275.00 per hour.

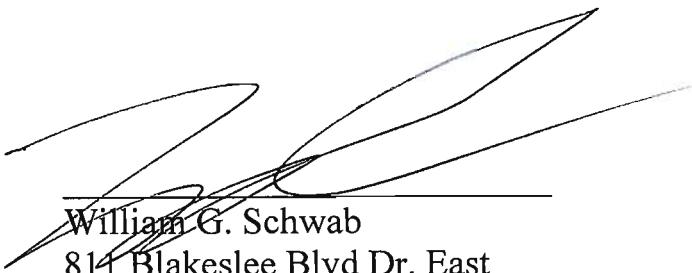
8. Each of these hourly rates is reasonable for services performed in the Northern Tier of the Middle District of Pennsylvania by attorneys with a similar level of experience.

9. I currently employ an associate named Eric J. Filer who has been an attorney for a little over two years. He was admitted in October 2013. I bill his services at the rate of \$275.00 per hour.

10. Additionally, I understand that compensation is being requested for paralegal services at the rate of \$125.00 per hour. This is a reasonable rate for this market. My firm bills for paralegals at the rate of \$90.00 per hour.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief.

Executed on: 2/8/16



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